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ROBERT W. ALLEN, ADMINISTRATOR

16 February 93

The Commission  
Federal Communication Commission  
Washington, D.C. 206554

RE: Replacement of Part 90  
by Part 88 to Revise  
the Private Land Mobile  
Radio Services and Modify  
the Policies Governing them

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In regards to the FCC's proposed changes PR92-235, our review of the potential application in our setting causes us serious concerns:


1. These changes are designed to address problems which effect urban metropolitan areas. We are not an urban metropolitan area. We currently do not experience the communication problems for which these changes are addressing nor is it expected that any time in the near future would this become a problem.
2. After consultation with our communication engineers and experts, and given our sparsely populated area, the mountainous environment, we believe that the proposed communication systems would be very likely to perform substandardly.
3. The proposed rule changes would subject this county of 20,000 to an expense of approximately \$1,000,000.00, for which no funding is being proposed.

In review, the proposed changes in PR235 would try to solve problems that do not exist in our setting, would incur us great financial burdon and most importantly would actually hinder effective and timely communication so important to the proper performance of our EMS system and the people that they serve.

We propose rather that ammendments be made to allow for rural low density areas to continue operating in much the same manner as before.

Sincerely,

  
Robert Allen  
Administrator

  
Kevin F. O'Meara, M.D.  
Emergency Department Director

KO/sa

An Intermountain Health Care Facility